

## REMARKS

By the present amendment, Applicants cancel claim 16 without prejudice or disclaimer. Upon entry of the Amendment, claims 1-15 and 18 remain pending.

In the Office Action mailed on July 2, 2003, the Examiner withdrew the objection to claim 13, the rejection of claims 5 and 6 under 35 U.S.C. §112, first paragraph, and the rejection of claims 4-6 under 35 U.S.C. §112, second paragraph.

Further, claims 1 and 18 were rejected under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 4,390,874 to *Woodside et al.*; claims 2-6 and 9-11 were rejected under 35 U.S.C. §103(a) as unpatentable over *Woodside* in view of U.S. Patent No. 5,663,743 to *Fujii et al.*, and in view of U.S. Patent No. 3,956,661 to *Sakamoto et al.*; claims 7, 8, 14, and 15 were rejected under 35 U.S.C. §103(a) as unpatentable over *Woodside* in view of U.S. Patent No. 6,121,943 to *Nishioka et al.*, or over *Woodside*, *Sakamoto*, and *Fujii*, as applied to claim 2, and further in view of *Nishioka*; claims 12 and 16 were rejected under 35 U.S.C. §103(a) as unpatentable over *Woodside*, *Sakamoto*, and *Fujii*, as applied to claim 2, and further in view of *The Electrical Engineering Handbook*, CRC Press, 1993; claim 13 was rejected under 35 U.S.C. §103(a) as unpatentable over *Woodside*, *Sakamoto*, and *Fujii*, as applied to claim 2, and further in view of U.S. Patent No. 5,473,289 to *Ishizaki et al.*

Finally, the Examiner stated that "should claim 12 be found allowable, claim 16 will be objected to under 37 C.F.R. 1.75" as a substantial duplicate thereof. Applicants

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disagree with the Examiner. However, to advance the prosecution of the instant application, Applicants cancel claim 16 without prejudice or disclaimer thereof.

Applicants respectfully disagree with the Examiner's arguments and conclusions and respectfully traverse both the 35 U.S.C. §102(b) and §103(a) rejections for at least the following reasons.

*Section 102(b) Rejections*

To anticipate claims 1 and 18 under 35 U.S.C. §102(b), *Woodside*, must disclose each and every element recited in the claims. M.P.E.P. § 2131.01 (8<sup>th</sup> ed. 2001, revised February 2003). *Woodside* fails to disclose each and every element of claims 1 and 18 so the rejections under section 102(b) should be withdrawn.

*Woodside* discloses "a liquid crystal system having improved temperature compensation using multiple capacitance ratios for different display temperature ranges." *Woodside*, Abstract. According to *Woodside*, a "temperature compensator 24 is provided for monitoring the operating temperature of the liquid crystal display 20 and for interacting with the voltage regulator 18 to vary the effective RMS value of the applied operating voltages to maintain the contrast ratio within a predetermined range." *Woodside*, col. 2, ll. 62-67.

Claim 1 recites, among other things, "a brightness control circuit, provided in [a] scan driver power circuit, for controlling brightness of [a] liquid crystal display device by changing the voltage level of [a] scan driver voltage."

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Nowhere does *Woodside* teach at least "a brightness control circuit, provided in said scan driver power circuit, for controlling brightness of said liquid crystal display," as recited in claim 1. The Examiner does not even mention this element of the claim in the Office Action. For at least this reason, *Woodside* fails to teach each and every element recited in claim 1. Therefore, Applicants respectfully request the reconsideration and withdrawal of the section 102(b) rejection of claim 1.

Claim 18 depends from claim 1 and include all the elements thereof. Therefore, claim 18 is also allowable at least based on such dependency and for at least the same reasons discussed above with respect to allowable claim 1. Therefore, Applicants respectfully request the reconsideration and withdrawal of the section 102(b) rejection of claim 18.

#### *Section 103(a) Rejections*

With respect to the rejections of claims 2-15 under 35 U.S.C. §103(a), Applicants respectfully submit, a *prima facie* case of obviousness has not been made. To properly establish a *prima facie* case of obviousness under 35 U.S.C. §103(a), the Examiner must demonstrate that all claim elements are taught or suggested in the references relied on by the Office; that there is a suggestion or motivation to combine the references to result in the claimed invention, and that there is a reasonable expectation of success in doing so. (8<sup>th</sup> ed. 2001, revised February 2003). This requirement must be found in the prior art — not based on Applicants' own disclosure. *Id.*, § 2131.

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Claims 2-6 and 9-11 each ultimately depends from allowable claim 1 and include all the elements thereof. As discussed above, *Woodside* fails to teach each and every element of claim 1 and, thus, of claims 2-6 and 9-11. Further, neither does *Fujii* nor *Sakamoto* teach or suggest at least a brightness control circuit provided in the scan driver circuit; a voltage regulation circuit and a temperature compensation circuit provided in the data driver power circuit, as recited in independent claim 1.

In addition, the Examiner failed to show that there is any suggestion or motivation to combine the cited references to result in the claimed invention nor a reasonable expectation of success in doing so. Indeed, neither does *Fujii* nor *Sakamoto* nor *Woodside* provide any suggestion or motivation to combine them to result in the claimed invention as discussed above. And the Examiner even does not so allege. Therefore, Applicants respectfully request the reconsideration and withdrawal of the section 103(a) rejection of claims 2-6 and 9-11.

Claims 7, 8, 14, and 15 each ultimately depends from allowable claim 1 and include all the elements thereof. As discussed above, *Woodside* fails to teach each and every element of claim 1 and thus, of claims 7, 8, 14, and 15. Further, as discussed above, neither does *Fujii* nor *Sakamoto* teach or suggest at least a brightness control circuit provided in the scan driver circuit; and a voltage regulation circuit and a temperature compensation circuit provided in the data driver power circuit, as recited in independent claim 1. And combining *Sakamoto* and *Fujii* with *Nishioka* does not overcome this deficiency. The Examiner also failed to show that there is any

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suggestion or motivation to combine the cited references to result in the claimed invention nor a reasonable expectation of success in doing so. Thus, Applicants respectfully request the reconsideration and withdrawal of the section 103(a) rejection of claims 7, 8, 14, and 15.

Claim 12 ultimately depends from allowable claim 1 and include all the elements thereof. As discussed above, *Woodside* fails to teach each and every element of claim 1 and thus, of claim 12. Further, as discussed above, neither does *Fujii* nor *Sakamoto* teach or suggest at least a brightness control circuit provided in the scan driver circuit; and a voltage regulation circuit and a temperature compensation circuit provided in the data driver power circuit, as recited in independent claim 1. Combining *Sakamoto* and *Fujii* with *Electrical Engineering Book* does not overcome this deficiency. The Examiner also failed to show that there is any suggestion or motivation to combine the cited references to result in the claimed invention nor a reasonable expectation of success in doing so. Thus, Applicants respectfully request the reconsideration and withdrawal of the section 103(a) rejection of claim 12.

In view of cancellation of claim 16, without prejudice or disclaimer, the 103(a) rejection of claim 16 is deemed moot.

Finally, Claim 13 ultimately depends from allowable claim 1 and include all the elements thereof. As discussed above, *Woodside* fails to teach each and every element of claim 1 and thus, of claim 13. Further, as discussed above, neither does *Fujii* nor *Sakamoto* teach or suggest at least a brightness control circuit provided in the

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scan driver circuit; and a voltage regulation circuit and a temperature compensation circuit provided in the data driver power circuit, as recited in independent claim 1. Combining *Sakamoto* and *Fujii* with *Ishizaka* does not overcome this deficiency. The Examiner also failed to show that there is any suggestion or motivation to combine the cited references to result in the claimed invention nor a reasonable expectation of success in doing so. Thus, Applicants respectfully request the reconsideration and withdrawal of the section 103(a) rejection of claim 13.

In view of the foregoing, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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